

International Seabed Authority
14-20 Port Royal Street
Kingston
Jamaica

Potsdam, 24 June 2021

To: ola@isa.org.jm

IASS Comments on the Draft standard and guidelines for the preparation and implementation of emergency response and contingency plans

Dear Madam/Sir,

The Institute for Advanced Sustainability Studies (IASS), which has had observer status at the Authority since 2017, is pleased to provide comments, as annexed to this cover letter, on the *Draft standard and guidelines for the preparation and implementation of emergency response and contingency plans*, open for public consultation until 3 July 2021 (<https://isa.org.jm/mining-code/standards-and-guidelines>).

We provide express consent for this document to be uploaded to the Authority's website and for wider dissemination. The following persons have contributed to this document: Dr Sabine Christiansen, Pradeep Singh, Dr Aline Jaeckel, and Sebastian Unger.

If you have any questions, kindly contact us at Sebastian.Unger@iass-potsdam.de. We thank you for your kind attention.

Yours sincerely,

Sebastian Unger

Lead, Ocean Governance Research Group

Institute for Advanced Sustainability Studies e.V. (IASS)

TEMPLATE FOR COMMENTS

<i>Document reviewed</i>		
Title of the draft being reviewed:	Draft standard and guidelines for the preparation and implementation of emergency response and contingency plans	
<i>Contact information</i>		
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<i>General Comments</i>		
<p>Besides failures, hazards and accidents leading to serious harm to the marine environment, the contractor should also define an exceedance factor from the impact predicted in the EIS (e.g., total area impacted) that will activate the emergency response plan.</p>		
<p>Drills and emergency response organisation should also include environmental emergency response, such as oil spill fighting (or, alternatively, the exclusive use of diesel for propulsion and biodegradable hydraulic oils).</p>		
<i>Specific Comments</i>		
Page	Line	Comment
5	124	The draft standard should be more specific and e.g. identify the purpose of the emergency preparedness assessment rather than leaving it to the contractor/applicant.
15-17		The identification of accidental events (appendix, p. 15-17) should also include environmental accidents and impacts to be avoided and responded to.

Comments should be sent by e-mail to ola@isa.org.jm